

EB-06-TC-060
EB Docket No. 06-36

CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006

February 3, 2006

DOCKET FILE COPY ORIGINAL

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

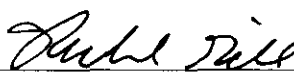
Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached our company's annual compliance certificate for the most recent period as required by section 64.2009(e) of the Commission's Rules together with a statement of our company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to the undersigned,

Sincerely,

CP-Tel Network Services, Inc. ("CP-Tel")


Richard Gill
President & General Manager

Cc: Bryon McCoy via e-mail bryon.mccoy@fcc.gov
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Statement of Customer Proprietary Network Information (CPNI) Compliance Procedures for CP-Tel

RCRTC complies with all CPNI regulations as contained in Section 222 of the Communications Act of 1934. This includes complying with the following CPNI safeguards:

Sec. 64.2009 Safeguards required for use of CPNI.

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

In accordance with the CPNI Rules, CP-TEL notified all customers regarding CPNI in January 2006. This notice included information on what CPNI is, what CP-TEL does to protect CPNI, and customer rights including how customers can prevent CP-TEL from using CPNI. Customers who request that CP-Tel not use CPNI will have a prominent notation on their customer record so that employees can clearly see their CPNI status. An electronic and paper list will also be kept updated.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

CP-TEL personnel received an in-depth training on CPNI rules and restrictions on November 18, 2005. Disciplinary processes for employees not following CPNI rules follow CP-TEL's established disciplinary procedures.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

To date, CP-TEL has not used CPNI. If and when CP-Tel uses CPNI for marketing purposes, this safeguard will be followed. CP-TEL does not disclose CPNI information to third parties.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

To date, CP-TEL has not used CPNI for outbound marketing programs or campaigns. If and when CP-Tel uses CPNI for marketing purposes, this safeguard will be followed. An RCRTC supervisor has been identified for this responsibility and RCRTC sales personnel are trained to follow this supervisory approval process prior to use of CPNI.

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.

Dated: January 31, 2006

This safeguard has been met and CP-Tel's compliance certificate and this statement of compliance procedures are on file in our office per the CPNI rules.

Dated: January 31, 2006